

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DANIEL HERSL,

Defendant.


CRIMINAL NO. GLR-17-0106-03


JOINT MOTION TO SEAL

The United States and the Defendant jointly move to seal portions of their respective filings related to Defendant Daniel Hersl's Motion for Compassionate Release, ECF No. 856. Specifically, the Defendant seeks to seal to redacted portions of his Motion. Additionally, the United States moves to seal the redacted portions of its Opposition to Defendant's Emergency Motion for Compassionate Relief, ECF No. 863, and Exhibit 3 to the Opposition. The parties also move to seal redacted portions of the forthcoming supplemental briefings ordered by the Court, ECF 871. The parties also seek to seal portions of this Motion.

1. To seal a document the government must demonstrate that: (1) there is a compelling government interest requiring materials to be kept under seal and (2) there is no less restrictive means, such as redaction, available. *In re Search Warrants Issued on April 26, 2004*, 353 F. Supp. 2d 584 (D. Md. 2004).

2. As explained in further detail below, the parties are moving to seal certain documents and portions of their filings, portions of this Motion, and portions of future filings ordered by the Court, to protect the health and welfare of the Defendant.





WHEREFORE, the United States requests that the Court grant its Motion.

Respectfully submitted,

Erek L. Barron
United States Attorney

_____/s/_____
Matthew P. Phelps
Assistant United States Attorney
U.S. Attorney's Office
District of Maryland
36 South Charles Street
Baltimore, Maryland 21201
(410) 209-4800
matthew.phelps@usdoj.gov

_____/s/_____
Christopher Madiou
6305 Ivy Lane, Suite 700
Greenbelt, MD 20770
chris@madioulaw.com
(301) 474-5730